

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

ZHAOYIN WANG,  
Plaintiff,

v.

BETA PHARMA, INC., DON ZHANG,  
AND ZHEJIANG BETA PHARMA  
CO., LTD.,  
Defendants.

Civil Action No. 3:14-cv-01790-VLB

DECEMBER 5, 2014

MOTION TO TRANSFER THIS ACTION TO THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

Pursuant to 28 U.S.C. § 1404(a), defendants Beta Pharma, Inc. ("Beta Pharma") and Don Zhang (collectively, "Defendants") hereby move to transfer this action to the United States District Court for the District of New Jersey. As fully explained in the Memorandum of Law filed herewith, such transfer is appropriate because there is currently no relevant connection between the case and Connecticut, but there are substantial connections between this case and New Jersey. Plaintiff Zhaoyin Wang is a resident of Canada. Defendants Beta Pharma, Inc. and Don Zhang reside in New Jersey. Besides the location of Plaintiff's counsel's office, no aspect of this case has any connection to Connecticut. Therefore, and for all the reasons presented in the Memorandum of Law, a transfer of venue to the U.S. District Court for the District of New Jersey is appropriate under 28 U.S.C. § 1404(a) because such a transfer will promote convenience and justice.

ORAL ARGUMENT NOT REQUESTED

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**WHEREFORE, Defendants respectfully request that the Court grant this Motion.**

**DEFENDANTS BETA PHARMA, INC. AND DON ZHANG**

By: /s/  
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-- Their Attorney--

**CERTIFICATION OF SERVICE**

I hereby certify that on December 5, 2014 a copy of the foregoing was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/  
Michael G. Caldwell (ct 26561)